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*Attorneys for Defendants/Counterclaimants
DaVita Inc.; DaVita Medical Holdings, LLC;
and DaVita Medical Management, LLC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHERIF W. ABDYOU, M.D. and AMIR S.
BACCHUS, M.D.,

Plaintiffs,

v.

DAVITA INC., HEALTHCARE PARTNERS
HOLDINGS, LLC, and HEALTHCARE
PARTNERS, LLC,

Defendants.

AND RELATED CLAIMS.

Case No. 2:16-cv-02597-APG-CWH

**STIPULATION AND ORDER TO WITHDRAW
DEFENDANTS/COUNTERCLAIMANTS'
MOTION TO COMPEL PRODUCTION OF
DOCUMENTS [ECF No. 202]**

IS HEREBY STIPULATED AND AGREED by and between Plaintiffs/Counterdefendants
Sherif W. Abdou, M.D. and Amir S. Bacchus, M.D. ("Abdou/Bacchus") and Defendants/
Counterclaimants DaVita Inc. ("DaVita"), DaVita Medical Holdings, LLC, f/k/a HealthCare
Partners Holdings, LLC ("HCP Holdings"), and DaVita Medical Management, LLC, f/k/a
HealthCare Partners, LLC ("HCP") (collectively, the "DaVita Parties") (collectively, the "Parties"),
through their undersigned counsel, as follows:

1 1. On October 23, 2018, the DaVita Parties filed their Motion to Compel Production of
2 Documents (ECF No. 202) (the “Motion to Compel”), seeking to compel responses to certain
3 requests for production propounded to Abdou/Bacchus.

4 2. Subsequently, on October 26, 2018, Abdou/Bacchus produced responsive documents
5 to the DaVita Parties’ requests for production, which documents were the subject of the Motion to
6 Compel.

7 3. Abdou/Bacchus have represented that, to the best of their knowledge, the documents
8 produced (on October 26, 2018) are a complete production of the documents requested in the Motion
9 to Compel.

10 4. Based on Abdou/Bacchus’s production and representation, the Parties have agreed to
11 stipulate to withdraw the Motion to Compel.

12 DATED this 5th day of November, 2018.

13 KOLESAR & LEATHAM

14 By: /s/ Matthew T. Dushoff
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25 Attorneys for Plaintiffs Sherif W. Abdou,
26 M.D. and Amir S. Bacchus, M.D.

12 DATED this 5th day of November, 2018.

13 BAILEY ♦ KENNEDY

14 By: /s/ Paul C. Williams
15 JOHN R. BAILEY
16 JOSHUA M. DICKEY
17 KELLY B. STOUT
18 PAUL C. WILLIAMS
19 Attorneys for Defendants/Counterclaimants
20 DaVita Inc.; DaVita Medical Holdings, LLC;
21 and DaVita Medical Management, LLC

ORDER

IT IS SO ORDERED:

The Motion to Compel (ECF No. 202) is hereby WITHDRAWN.

IT IS FURTHER ORDERED that the related motion for leave to file excess pages (ECF No. 203) is DENIED as moot.


UNITED STATES MAGISTRATE JUDGE

November 6, 2018

Dated: _____

Respectfully Submitted by:

BAILEY ♦ KENNEDY

By: /s/ Paul C. Williams

JOHN R. BAILEY

JOSHUA M. DICKEY

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PAUL C. WILLIAMS

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and DaVita Medical Management, LLC*